

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MATTHEW SCHWARTZ

No. 21 CR 316

Judge Andrea R. Wood

**GOVERNMENT'S MOTION FOR AN EXTENSION OF TIME
TO PROVIDE RESTITUTION INFORMATION**

The UNITED STATES OF AMERICA, by and through its attorney JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves this Court to extend the time to provide victim restitution information to the Court and the Probation Department in this case pursuant to 18 U.S.C. § 3664 and, in support thereof, states as follows:

1. The superseding information in this case charges Matthew Schwartz (“defendant”) with one count of possession of child pornography in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

2. On or about August 23, 2022, defendant entered into a plea agreement. R. 78. In the plea agreement, defendant plead guilty to the charge in the superseding information and also stipulated to having committed a cyberstalking offense in violation of Title 18, United States Code, Section 2261A(2)(B). *Id.*

3. Pursuant to the Court’s August 23, 2022 Minute Order, R. 77, victim and restitution information is due 60 days prior to the sentencing hearing, which is October 3, 2022.

4. The government has identified the victims in this matter, but has been unable thus far to ascertain the extent of restitution owed to the victims. The Assistant United States Attorney assigned to this matter began her service in the United States Attorney's Office on August 15, 2022, and is working to learn the facts of the case while balancing daily, continuous training in multiple aspects of federal criminal practice necessary to the performance of her duties. Therefore, the government is respectfully requesting an extension of time to provide restitution information to the Court and to the Probation Department. Pursuant to 18 U.S.C. § 3664(d)(5), the government requests that time be extended to and including November 17, 2022, or under further order of the Court.

5. Pursuant to 18 U.S.C. § 3664(d)(5), the government also requests leave to file an additional extension of time, not to exceed 90 days for the date of sentencing, if the victim's losses are not ascertainable by November 17, 2022.

6. Undersigned counsel has conferred with the assigned probation officer in this case pursuant to 18 U.S.C. § 3664(d)(1). Probation is unopposed to the extension of time.

7. Undersigned counsel has also conferred with defense counsel, and the defense is unopposed to the proposed extension of time.

WHEREFORE, the government respectfully requests that this Court extend the time to provide restitution information, to and including November 17, 2022,

with leave to file a motion for an additional extension of time, if necessary,
pursuant to 18 U.S.C. 3664(d)(5).

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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DATE: September 29, 2022